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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH

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|------------------------------|---|----------------------------------------|
| UNITED STATES OF AMERICA,    | : | <b><u>FELONY</u></b>                   |
|                              | : | <b><u>COMPLAINT</u></b>                |
| Plaintiff,                   | : |                                        |
|                              | : | VIOLATION: 2:20mj629 JCB SEALED        |
| vs.                          | : |                                        |
|                              | : | Count 1: 18 U.S.C. § 844(i), Arson in  |
| LARRY RAYNOLD WILLIAMS, JR., | : | Interstate Commerce                    |
|                              | : |                                        |
| Defendant.                   | : | U.S. Magistrate Judge Jared C. Bennett |

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Before the Honorable Jared C. Bennett, United States Magistrate Judge for the District of Utah, appeared the undersigned, who on oath deposes and says:

**COUNT 1**  
18 U.S.C. § 844(I)  
[Arson in Interstate Commerce]

On or about May 30, 2020, in the District of Utah,

LARRY RAYNOLD WILLIAMS, JR.,  
Defendant herein, maliciously damaged and destroyed, and attempted to maliciously damage and destroy, by means of fire and explosives, a vehicle, to wit: a Salt Lake City Police Department

patrol car, used in interstate commerce and in activities affecting interstate commerce, and did aid and abet therein; all in violation of 18 U.S.C. §§ 844(i) and 2.

**AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT**

Complainant, JEFFREY T. WRIGHT, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the United States Department of Justice, Federal Bureau of Investigation, and have been employed in that capacity for approximately twelve years. I am currently assigned to the Salt Lake City Division of the FBI and have primary investigative responsibility for federal crimes related to national security and domestic terrorism. I gained experience in such investigations through previous case investigations, formal training, and in consultation with law enforcement partners in local, state and federal law enforcement agencies. I have been trained to investigate federal crimes and have investigated an array of complex federal crimes. As a federal agent, I am authorized to investigate violations of the law of the United States and have authority to execute arrest and search warrants issued under the authority of the United States.

2. The statements in this affidavit are based, in part, on an investigation conducted by myself and/or communicated to me by other law enforcement officers, other investigators with knowledge of this investigation, and witnesses who observed the incident, as well as information obtained from the State of Utah. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included every fact known to me concerning this investigation. Rather, I have set forth facts sufficient to establish probable cause for the complaint.

**STATEMENT OF PROBABLE CAUSE**

3. The probable cause for this warrant comes from a suspected violation of Title 18 United States Code § 844(i), Malicious Destruction by Fire or Explosive, which reads in part:

- i. Whoever maliciously damages, or destroys, or attempts to destroy, by means of fire or an explosive any building, vehicle, or other real or personal property used in interstate or foreign commerce or in any activity affecting interstate or foreign commerce shall be imprisoned

4. On May 30, 2020, protestors took to the streets of Salt Lake City, Utah, to call for justice after the killing of George Floyd on May 25, 2020, in Minneapolis, Minnesota. Some of the protestors in Salt Lake City were non-residents of Utah.

5. During the protest, Salt Lake City Police Officers and other law enforcement personnel were deployed throughout the downtown area to protect individuals, businesses, and property. Police officers used law enforcement vehicles throughout the protest to transport law enforcement personnel, to provide emergency aid and assistance, and to serve as a resource for crowd control measures.

6. The Salt Lake City Police Department regularly conducts business in interstate commerce, for instance by purchasing vehicles and other equipment and supplies in interstate commerce. The activities of the Salt Lake City Police Department in enforcing laws and responding to emergencies also affect interstate commerce.

7. On the afternoon of May 30, 2020, the peaceful protest in downtown Salt Lake City devolved into acts of destruction and violence.

8. More specifically, on the afternoon of May 30, 2020, Salt Lake Police Officer A.L. drove her patrol car east on 400 South in Salt Lake City en route to the Public Safety

Building. After driving through the intersection of 200 East and 400 South, protestors boxed-in and immobilized her patrol car. Fearing for her safety, Officer A.L. was forced to flee from her vehicle. Moreover, Officer A.L. could not retrieve her weapons, ammunition, protective gear and law enforcement computer from the vehicle before rioters overturned her patrol car, looted and vandalized it, and set it on fire.

9. Video footage from various sources showed individual rioters using fire and explosives to damage and destroy the patrol car.

10. The patrol car was engulfed in flames, as shown in the photograph below:



11. The patrol car was completely destroyed by fire, as shown in the photograph below:

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12. On May 31, 2020, ATF Special Agent Certified Fire Investigator Candidate Tyler Olson and Salt Lake City Fire Investigators examined the destroyed patrol car, identified further as a Chevrolet Impala. From the physical examination of the patrol car and the video and photographic evidence, it was SA Olson's opinion that the destruction of the patrol car was incendiary in nature.

13. The patrol car was more fully identified as a 2010 Chevrolet Impala Police Car, bearing Vehicle Identification Number 2G1WD5EM5A1149042, and further identified as Salt Lake City patrol car 40551. The patrol car was purchased by Salt Lake City on October 19, 2009, from Young Chevrolet Company in Layton, Utah. The patrol car was manufactured at the Oshawa Car Assembly Plant in Oshawa, Ontario, Canada.

14. Officer A.L. utilized the patrol car daily in the performance of her official duties, to include responding to emergencies and to various calls for service. Dispatch calls included, but were not limited to, responding to fights in progress, domestic violence, 911 hang-ups, rendering aid, assisting with transients (some of whom were out-of-state residents), and responding to shoplifting and property crimes at businesses in the city.

15. Officer A.L. utilized the patrol car in enforcing traffic laws, including responding to traffic accidents on interstate highways. Officer A.L. often utilized her assigned patrol vehicle to transport arrestees via the interstate highways and has cited multiple out-of-state residents. 19. Officer A.L. used the patrol car for daily access, via a mounted laptop computer, to law enforcement databases, to include the National Crime Information Center (NCIC). She utilized these databases to ascertain the identities of persons and to obtain ownership information of vehicles she encountered during the performance of her official law enforcement duties. Access to these databases via the patrol car's mounted laptop required the use of the internet.

16. Video footage from the afternoon of May 30, 2020, showed a white male, later identified by law enforcement as CHRISTOPHER ISIDRO ROJAS, wearing an unbuttoned, black and red flannel shirt over a grey t-shirt, a dark-colored baseball cap worn backwards, dark-colored shoes with white soles, and a medical-style face mask, standing next to an African American male, subsequently identified by law enforcement as LARRY RAYNOLD WILLIAMS, JR., who was dressed in a black Nike hoodie, black Nike sweatpants, black shoes, and a black gas mask. See photograph below:

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17. ROJAS was observed holding a blue cigarette lighter in his hands while WILLIAMS held a white combustible fabric material, similar in appearance to a tablecloth or bedsheet. ROJAS then used the cigarette lighter to ignite the fabric, as depicted in the photographs below:

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18. Once the white fabric began to burn, WILLIAMS threw the material into the window of the overturned patrol car. The burning material landed partially within the interior of the patrol car and partially on the street, as shown in the photographs below:



19. WILLIAMS, who was depicted above wearing a gasmask and working in concert with ROJAS, was also observed on video unmasked, as identified in the photographs below:



20. Investigators subsequently identified the gas mask worn by WILLIAMS through visual comparisons as an M50 Joint Service General Protective Mask. Clarified photographs of WILLIAMS wearing the mask further revealed lettering on its attached M61 filter canister, written in what appeared to be white marker, which stated, "TRNG ONLY". A visible Lot Number inscribed on the underside of the opposing M61 filter canister was also observed. See the photographs below:





21. WILLIAMS was identified as an Airman First Class in the United States Air Force (USAF), stationed at Hill Air Force Base (HAFB) in northern Utah.

22. In March 2020, WILLIAMS was issued an M50 gas mask by his unit for training purposes.

23. Investigators further learned the “TRNG ONLY” marking observed on the mask was consistent with the markings applied at HAFB, including the use of a white paint pen.

24. On or about August 13, 2020, the readiness squadron at HAFB conducted a general inventory check of equipment issued to WILLIAMS and other members of his group during an exercise. Upon doing so, a hand receipt was generated and serial/lot numbers were documented for each inventoried item. The lot number for one of the gas mask filter canisters assigned to WILLIAMS was documented on the hand receipt as AV0104791A.

25. I subsequently confirmed the recorded lot number as appearing identical to the number observed on the gas mask as depicted in the photograph included in paragraph 20.

26. Investigators also observed several photographs of WILLIAMS, including his driver's license photograph and photographs posted to publicly viewable social media platforms, and compared those to the photographs of WILLIAMS unmasked at the protest, confirming that WILLIAMS appeared similar in both visual appearance and physical description.

### **CONCLUSION**

27. Based on the above described facts, I respectfully request an arrest warrant be issued for LARRY RAYNOLD WILLIAMS, JR., for a violation of 18 U.S.C. § 844(i).

28. I swear this information is true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

WRIGHT.JEFFREY.F22  
M86K81

Digitally signed by WRIGHT.JEFFREY.F22M86K81  
DN: c=US, o=U.S. Government, ou=NSS, ou=FBI,  
ou=People, cn=WRIGHT.JEFFREY.F22M86K81  
Date: 2020.08.17 12:57:49 -06'00'

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Jeffrey T. Wright  
Special Agent  
Federal Bureau of Investigation

The affiant appeared before me by telephonic conference on this date pursuant to Fed. R. Crim. P. 4.1 and affirmed under oath the content of this affidavit and application.

Subscribed and sworn to before me on August 17, 2020:



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JARED C. BENNETT  
United States Magistrate Judge